

EXHIBIT B

November 15, 2024 Email Correspondence

(Attached)

Angelo, Jason D

Subject: FW: Follow-Up on Discovery Requests and Rule 30(b)(6) Deposition | In re CarePoint Health Systems, Inc., et al., Case No. 24-12534 (JKS)

From: Hughes, Peter C. <phughes@dilworthlaw.com>

Sent: Friday, November 15, 2024 2:34 PM

To: Angelo, Jason D <JAngelo@reedsmith.com>; Aaronson, Anne M. <aaaronson@dilworthlaw.com>; McMichael, Lawrence G. <lmcmichael@dilworthlaw.com>; Small, Jack <jsmall@dilworthlaw.com>

Cc: Gwynne, Kurt F. <KGwynne@ReedSmith.com>; Capp, Cameron A. <CCapp@reedsmith.com>; Comerford, Christie Callahan <ccomerford@dilworthlaw.com>; Davis, Matthew H. <mdavis@dilworthlaw.com>

Subject: RE: Follow-Up on Discovery Requests and Rule 30(b)(6) Deposition | In re CarePoint Health Systems, Inc., et al., Case No. 24-12534 (JKS)

Jason, please see my responses below in red.

Please copy Christie Comerford and Matt Davis of Dilworth (emails above) on all communications regarding discovery.
Pete

PETER C. HUGHES | DILWORTH PAXSON LLP

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From: Angelo, Jason D <JAngelo@reedsmith.com>

Sent: Friday, November 15, 2024 1:43 PM

To: Hughes, Peter C. <phughes@dilworthlaw.com>; Aaronson, Anne M. <aaaronson@dilworthlaw.com>; McMichael, Lawrence G. <lmcmichael@dilworthlaw.com>; Small, Jack <jsmall@dilworthlaw.com>

Cc: Gwynne, Kurt F. <KGwynne@ReedSmith.com>; Capp, Cameron A. <CCapp@reedsmith.com>

Subject: Follow-Up on Discovery Requests and Rule 30(b)(6) Deposition | In re CarePoint Health Systems, Inc., et al., Case No. 24-12534 (JKS)

Dear Pete,

I'm following up on my voicemail regarding our outstanding document requests. Please confirm by close of business today that the debtors will produce all documents requested in our first set of requests for production no later than Wednesday, November 27th. We may object to some of the requests. With respect to requests that we do not object to, we will make a good faith effort to produce documents by Nov. 27. Given the very broad scope of documents requested, the short time period in which you are requesting production, and the multiple duties of the debtor employees who will be involved in looking for documents, we are not guaranteeing that all documents will be produced by Nov. 27.

Regarding the Rule 30(b)(6) deposition, we are willing to accommodate a date change to December 4th and agree to hold the deposition at a conference room at Christ Hospital in Jersey City. The location would be Hoboken University Medical Center in Hoboken. Given this flexibility, we expect no issues with allotting the full 7 hours permitted under Rule 30(d)(1). We propose starting at 8:30 a.m. and continuing until 3:30 p.m. (which will accommodate the 4:00 p.m. meeting you mentioned). Please confirm if this schedule is acceptable. It is not. Larry McMichael, who is defending the deposition, is off today but will be available next week to address the timing of the deposition.

Additionally, please advise:

1. How many witnesses the debtors will produce;
2. If more than one witness, identify the specific topics from our deposition notice each witness will address; and
3. If a single witness will be produced, confirm that they are prepared to testify comprehensively and competently on all topics outlined in the deposition notice.

With respect to 1, 2, and 3, we have not yet determined these issues.

Please note that our agreement to the December 4th deposition is contingent upon receiving a fully responsive document production by November 27th. If the debtors are unwilling or unable to meet this deadline, inform us immediately, as we will need to prepare appropriate filings to compel expedited production. See answers above.

Let us know if you are available to discuss these matters further.

Thank you,

Jason D. Angelo

He/Him/His

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From: Hughes, Peter C. <phughes@dilworthlaw.com>

Sent: Wednesday, November 13, 2024 8:30 PM

To: Angelo, Jason D <JAngelo@reedsmith.com>; Aaronson, Anne M. <aaaronson@dilworthlaw.com>; McMichael, Lawrence G. <lmcmichael@dilworthlaw.com>; Small, Jack <jsmall@dilworthlaw.com>

Cc: Gwynne, Kurt F. <KGwynne@ReedSmith.com>; Capp, Cameron A. <CCapp@reedsmith.com>; Hughes, Peter C. <phughes@dilworthlaw.com>

Subject: RE: In re CarePoint Health Systems, Inc., et al., Case No. 24-12534 (JKS) | Strategic Ventures, LLC's Cash Collateral Objection, R. 30(b)(6) Deposition Notice, and 1st Set of Requests for Production

Jason, as you know we have offered to make the witness available on December 4th at the Debtors' location in North Jersey.

Please advise regarding that date and location.

Pete

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From: Angelo, Jason D <JAngelo@reedsmith.com>

Sent: Wednesday, November 13, 2024 7:59 PM

To: Aaronson, Anne M. <aaaronson@dilworthlaw.com>; Hughes, Peter C. <phughes@dilworthlaw.com>; McMichael, Lawrence G. <lmcmichael@dilworthlaw.com>; Small, Jack <jsmall@dilworthlaw.com>

Cc: Gwynne, Kurt F. <KGwynne@ReedSmith.com>; Capp, Cameron A. <CCapp@reedsmith.com>

Subject: In re CarePoint Health Systems, Inc., et al., Case No. 24-12534 (JKS) | Strategic Ventures, LLC's Cash Collateral Objection, R. 30(b)(6) Deposition Notice, and 1st Set of Requests for Production

Counsel:

Please find attached service copies of (i) the *Objection of Strategic Ventures, LLC to Garden State Healthcare Associates, LLC's Use of Cash Collateral* [D.I. 133] and (ii) *Strategic Ventures, LLC's Notice of Deposition Upon Oral Examination of Designated Representative of the Debtors Pursuant to Fed. R. Civ. P. 30(b)(6) as Incorporated by Fed. R. Bankr. P. 7030 and 9014* [D.I. 134].

Please also find attached *Strategic Ventures, LLC's First Set of Requests for Production of Documents Propounded on the Debtors*.

With respect to the date/time/location of the Rule 30(b)(6) deposition, while the notice indicates a deposition at our offices on December 2nd starting at 10:00 a.m., we are happy to discuss further in an attempt to work out any issues regarding date/time/location.

Regards,

Jason D. Angelo

He/Him/His

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